

THE HONORABLE BARBARA J. ROTHSTEIN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

GORDON HEMPTON,

Plaintiff,

v.

POND5 , INC., a Delaware Corporation;
and POND5 USER CKENNEDY342, a
corporation or individual of type unknown,

Defendants.

NO. 3:15-cv-05696-BJR

DECLARATION OF ROGER M.
TOWNSEND IN SUPPORT OF
PLAINTIFF'S RESPONSE TO THE
COURT'S ORDER TO SHOW CAUSE
(DKT #50)

Roger M. Townsend states:

I am an attorney licensed to practice before the courts of the State of Washington. I represent Plaintiff Gordon Hempton. I have personal knowledge of the facts stated herein and am competent to testify to these facts.

1. Attached hereto as **Exhibit 1** is a true and correct copy of Greogory Bundy's expert report dated October 23, 2016.

2. Attached hereto as **Exhibit 2** is a true and correct copy of Paul Virostek's expert report.

3. Attached hereto as **Exhibit 3** is a true and correct copy of the August 16, 2016 deposition transcript of Thomas Crary at pertinent pages.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DECLARATION OF ROGER M. TOWNSEND IN
SUPPORT OF PLAINTIFF'S RESPONSE TO THE
COURT'S ORDER TO SHOW CAUSE - 1

BRESKIN | JOHNSON | TOWNSEND PLLC
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1 Dated this 7th day of November, 2016 in Seattle, Washington.

2 BRESKIN JOHNSON & TOWNSEND, PLLC

3 By: s/Roger M. Townsend
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6 Seattle, WA 98104
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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on November 7, 2016, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

/s/ Jamie Telegin
Jamie Telegin, Legal Assistant